

EXHIBIT 4

EXHIBIT FILED UNDER SEAL

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,	
PASSENGER SEXUAL ASSAULT	Case No.
LITIGATION,	3:23-md-03084-CRB

This Document Relates to:	
Jaylynn Dean v. Uber Technologies,	
Inc., et al., 3:23-cv-06708	

REMOTE VIDEOTAPED DEPOSITION OF OLAJUWON RAMOS
TAKEN ON BEHALF OF THE DEFENDANTS
ON JUNE 26, 2025, BEGINNING AT 8:11 A.M. CST
VIA ZOOM

Job No. CS7420527
VIDEOTAPED BY: Kevin Frank
REPORTED BY: D. Luke Epps, CSR, RPR

1 Q Okay. And what happened?

2 A I basically got into an argument.
3 Neighbors called the police. The police came. They
4 seen that my wife was crying, upset. Said it looks
5 like she was assaulted. They thought I had a gun on
6 me because I owned a firearm. They took me in.
7 Basically, I didn't have money for a lawyer. I took
8 a plea deal, which they said a deferred would pretty
9 much be like I never got charged with it, so I just
10 took the plea and, you know, did probation and
11 finished that and that was the end of it.

12 Q When you say you took a plea, what does
13 that mean?

14 MS. ELLIS: Objection. Form.

15 THE WITNESS: Basically, they offered me a
16 plea deal to rather go to trial or to basically
17 complete so many, like, community service hours, do
18 probation, and they said basically it's like --
19 pretty much, they told me it's like it never
20 happened. I'm not convicted or I'm not -- it's not
21 saying that I was or I wasn't basically convicted of
22 it.

23 Q (BY MS. CLEMENT) Do you know if you pled
24 guilty?

25 MS. ELLIS: Objection. Form.

1 THE WITNESS: I pled no contest.

2 Q (BY MS. CLEMENT) You believe you pled no
3 contest?

4 A Yes.

5 Q Okay. Would it surprise you if there's a
6 record that says that you pled guilty?

7 MS. ELLIS: Objection. Form.

8 THE WITNESS: Honestly, it does in a way
9 because, like I said, I just -- was just trying to
10 do whatever I could just to get it over with.

11 Q (BY MS. CLEMENT) Did you have to pay any
12 fines?

13 MS. ELLIS: Objection. Form.

14 THE WITNESS: Yes.

15 Q (BY MS. CLEMENT) Do you remember the
16 amount of the fine?

17 A No.

18 Q Did you have to do community service?

19 MS. ELLIS: Objection. Form.

20 THE WITNESS: Yes.

21 Q (BY MS. CLEMENT) Do you remember how much
22 community service you had to do?

23 MS. ELLIS: Objection. Form.

24 THE WITNESS: No.

25 Q (BY MS. CLEMENT) Did you hurt your wife?